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December 12, 2018

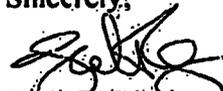
Federal Election Commission
Office of General Counsel
Attn: Amanda Andrade, Esq.
999 E Street, NW
Washington, DC 20463

Re: MUR 7545

Dear Ms. Andrade:

Please accept the attached response to MUR 7545 by Tea Party Majority Fund.

Sincerely,


Scott B. Mackenzie
Treasurer

Paid for by Tea Party Majority Fund
2776 S. Arlington Mill Drive #806 • Arlington, VA 22206



Tea Party Majority Fund Response to MUR 7545

The Commission makes several allegations about Tea Party Majority Fund (C00566174) a committee registered as a Nonqualified Unauthorized political action committee, and NOT an Independent Expenditures Only PAC as stated in the MUR. This document will address those allegations.

2016 April Quarterly Report

The Commission alleges that Tea Party Majority Fund (TPMF) failed to disclose a debt on Schedule D of \$400,000 in IEs that were publicly disseminated prior to payment; and failed to file a 48-Hour Report for \$353,273.16 in IEs disclosed on Schedule E.

In the first quarter of 2016, TPMF listed IEs totaling \$753,273.16 – of those, \$400,000 were marked as memo entries, and the remaining \$353,273.16 were not, suggesting that TPMF aired and paid for \$353,273.16 in IEs but also aired and had not yet paid for \$400,000 in IEs. In addition, TPMF filed a 48-Hour Report disclosing \$400,000 in IEs for the period, but RAD questioned why TPMF did not file an additional 48-Hour Report for the remaining \$353,273.16.

The 48-Hour Report disclosed \$400,000 in IEs with a dissemination date of January 12, 2016. The subsequent itemized IEs totaling \$353,273.16 were payments made against the \$400,000 memo entries reported on Form 24 and reflected the same dissemination date. As shown below the Memo entry and Itemized IEs should not have been added but subtracted from each other.

48-Hour Notice 1/12/2016 (Form 24 memo entries)	\$ 400,000.00
Itemized Independent Expenditures	
Disbursement 1/29/2016; Dissemination 1/12/2016	\$ 136,592.37
Disbursement 2/23/2016; Dissemination 1/12/2016	114,025.54
Disbursement 3/29/2016; Dissemination 1/12/2016	102,655.25
Total Itemized IEs	<u>(353,273.16)</u>
Unpaid Memo Entries	<u>\$ 46,726.84</u>

The committee budgeted \$400,000 in IEs, paid \$353,273.16 within the reporting period and should have reported a debt of \$46,726.84 on Line 10, Schedule E.

In summary, the Commission's allegation that the committee failed to file a debt of \$400,000 is incorrect, as that amount should be reduced to \$46,726.84; and the \$353,273.16 reported as itemized IEs did not require an additional 48-Hour Notice as they were covered by the Form 24 filed on January 14th.

2016 October Quarterly Report

The Commission alleges that Tea Party Majority Fund (TPMF) failed to disclose a debt on Schedule D of \$450,000 in IEs that were publicly disseminated prior to payment; and failed to file a 48-Hour Report for \$393,569.24 in IEs disclosed on Schedule E. This situation is identical to the April Quarterly Report.

On July 11, 2016 the committee filed a 48-Hour Notice for \$450,000 in IEs for Voter Contact Calls opposing Hillary Clinton for President with a dissemination date of July 9th. The subsequent itemized IEs totaling \$393,569.24 were payments made against the \$450,000 memo entries reported on Form 24 and reflected the same dissemination date. As shown below the Memo entry and Itemized IEs should not have been added but subtracted from each other.

48-Hour Notice 7/09/2016 (Form 24 memo entries)		\$ 450,000.00
Itemized Independent Expenditures		
Disbursement 7/11/2016; Dissemination 7/09/2016	\$ 39,705.68	
Disbursement 7/18/2016; Dissemination 7/09/2016	75,402.44	
Disbursement 7/28/2016; Dissemination 7/09/2016	18,701.03	
Disbursement 8/05/2016; Dissemination 7/09/2016	84,673.31	
Disbursement 8/17/2016; Dissemination 7/09/2016	61,086.75	
Disbursement 8/29/2016; Dissemination 7/09/2016	61,369.69	
Disbursement 9/21/2016; Dissemination 7/09/2016	52,630.34	
Total Itemized IEs		<u>(393,569.24)</u>
Unpaid Memo Entries		<u>\$ 56,430.76</u>

The committee budgeted \$450,000 in IEs and paid \$393,569.24 within the reporting period. TPMF also reported a debt of \$56,430.76 on Line 10, Schedule E as required.

In summary, the Commission's allegation that the committee failed to file a debt of \$450,000 is incorrect, as the correct amount and the amount that was properly reported is \$56,430.76; and the \$393,569.24 reported as itemized IEs did not require an additional 48-Hour Notice as they were covered by the Form 24 filed on July 9th.

Amended 2016 12-Day Pre-General Report

The Commission alleges that Tea Party Majority Fund (TPMF) failed to disclose a debt on Schedule D of \$212,943.72 in IEs that were publicly disseminated prior to payment; but the committee did disclose a debt of \$56,430.76 thereby under reporting its debts by a figure of \$156,512.96 (\$212,943.72 - \$56,430.76) and the Committee does not dispute that number.

Overall Summary

As demonstrated above, TPMF appropriately filed 48-Hour Notices for Independent Expenditures incurred in the two (2) reports in question, the April and October Quarterly Reports. The Committee failed to file a debt of \$46,726.84 on the April Quarterly Report and underreported Debts by \$156,512.96 on the October Quarterly Report.